

CLERK'S OFFICE U.S. DISTRICT COURT
AT CHARLOTTESVILLE, VA
FILED

MAY 14 2021

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

U.S. District Court for
Western District of Virginia
Charlottesville Division

Civil Cases Sines, et al Plaintiffs

vs.

Kessler, et al, Defendants

Defendant Christopher Cantwell's Motion
to Stay Deposition.

Whereas,

There is currently a pending notice of deposition in which the Plaintiffs seek to depose Defendant Cantwell sometime in early June of 2021.

The Plaintiffs rescheduled this deposition after their misconduct was discovered, specifically, that they chose not to deliver vital documents, discovery, and correspondence to Defendant Cantwell for fourteen months.

As a result of the aforementioned misconduct, there is a motion for sanctions pending before this Court, in which ~~the Defendant~~ Defendant Cantwell alternatively seeks a dismissal of the Plaintiffs' claims against him, or a stop be put to their abuse of discovery powers.

An objection to the original notice of deposition caused Plaintiffs' misconduct to be discovered, and is still pending.

The combination of Plaintiffs' misconduct, and Defendant Cantwell's sudden, involuntary transport to another correctional facility, which is itself only a temporary stop, has made it impossible for Defendant Cantwell to prepare for his deposition.

And Plaintiffs are fully aware that their claims are false, and have been so aware since prior to the filing of this lawsuit,

Therefore,

Defendant Christopher Cantwell respectfully requests this Honorable Court stay Plaintiff's deposition of him indefinitely, until such time as the aforementioned circumstances have been resolved, and the Defendant has had at least 30 days to prepare, with access to the materials he was deprived of by his sudden transport.

Respectfully Submitted,
Christopher Cantwell

C Cantwell 5-7-2021